

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DAVEION LARON TEXAS SANDERS
DEANDRE MOSES SANDERS

Criminal No. **19-354**

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(ii),
841(b)(1)(C) and 846, 18 U.S.C. §§ 922(o) and
924(c)(1)(A)(i) and 18 U.S.C. § 5861(d))

INDICTMENT
COUNT ONE

FILED

NOV 21 2019

The grand jury charges:

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WEST. DIST. OF PENNSYLVANIA

On or about July 11, 2019, in the Western District of Pennsylvania, the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, did knowingly, intentionally and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to possess with intent to distribute and distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, and quantities of mixtures and substances containing a detectable amount of oxymorphone, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The grand jury further charges:

On or about July 11, 2019, in the Western District of Pennsylvania, the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, did knowingly, intentionally and unlawfully possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, and quantities of mixtures and substances containing a detectable amount of oxymorphone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii) and 841(b)(1)(C).

COUNT THREE

The grand jury further charges:

On or about July 11, 2019, in the Western District of Pennsylvania, the defendant, DEANDRE MOSES SANDERS, did knowingly, intentionally and unlawfully possess with the intent to distribute quantities of mixtures and substances containing detectable amounts of cocaine and oxymorphone, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

The grand jury further charges:

On or about July 11, 2019, in the Western District of Pennsylvania, the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, did knowingly, intentionally and unlawfully possess a machinegun as defined in Title 18, United States Code, Section 921(a)(23) and Title 26, United States Code, Section 5845(b), and which is further described as a Stag Arms, Model Stag-15, 5.56 caliber rifle bearing S/N179635 with a bump stock affixed.

In violation of Title 18, United States Code, Section 922(o)(1).

COUNT FIVE

The grand jury further charges:

On or about July 11, 2019, in the Western District of Pennsylvania, the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, knowingly possessed a firearm(s), to wit:

- (1) a Stag Arms, Model Stag-15, 5.56 caliber rifle bearing S/N179635 with a bump stock affixed; and/or
- (2) a SWD Cobray, model SS (Streetsweeper), 12 gauge shotgun bearing serial number SH11304;

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is conspiracy to distribute and possession with intent to distribute 500 grams or more of cocaine, and quantities of mixtures and substances containing a detectable amount of oxymorphone, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), 841(b)(1)(C), and 846, as charged at Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SIX

The grand jury further charges:

On or about July 11, 2019, in the Western District of Pennsylvania, the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, did knowingly and unlawfully possess firearms, as defined in Title 26, United States Code, Section 5845(a)(b), which were not registered to them in the National Firearms Registration and Transfer Record, specifically:

- (1) a Stag Arms, Model Stag-15, 5.56 caliber rifle bearing S/N179635 with a bump stock affixed; and/or
- (2) a SWD Cobray, model SS (Streetsweeper), 12 gauge shotgun bearing serial number SH11304;

In violation of Title 26, United States Code, Section 5861(d).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One through Six of this Indictment are incorporated by reference as if fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d); Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p); and Title 28, United States Code, Section 2461(c).

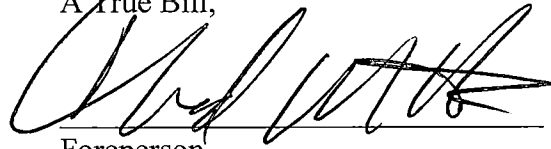
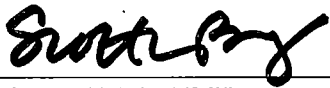
2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841(a)(1), 841(b)(1)(B)(ii) or 841(b)(1)(C), the defendants, DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following: \$35,000.00 in United States currency and/or a pair of diamond encrusted sunglasses.

3. As a result of the defendants, DAVEION LARON TEXAS SANDERS' and DEANDRE MOSES SANDERS', commission of violations of Title 18, United States Code, Section 922(o), Title 18, United States Code, Section 924(c)(1)(A)(i) and Title 26, United States Code, Section 5861(d) charged in Counts Four, Five and Six of this Indictment, the firearms alleged in those Counts, to wit:

- (a) a Stag Arms, Model Stag-15, 5.56 caliber rifle bearing serial number 179635
with a bump stock affixed; and
- (b) a SWD Cobray, model SS (Streetsweeper), 12 gauge shotgun bearing serial
number SH11304,

as well as a loaded Glock Model 19 firearm bearing serial number BDMH204, recovered from the residence of DAVEION LARON TEXAS SANDERS and DEANDRE MOSES SANDERS, on or about July 20, 2019, are subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).

A True Bill,


Foreperson

SCOTT W. BRADY
United States Attorney
PA ID No. 88352